

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
ELIZABETH D. KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7298
Facsimile: (415) 436-6748
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RANJITHKUMAR RAMU

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

Case No. 3:24-cv-04088 LJC

**STIPULATION TO STAY PROCEEDINGS;
~~[PROPOSED]~~ ORDER**

The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until March 19, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

1. Plaintiff filed this mandamus action seeking adjudication of his Form I-589, Application for Asylum and Withholding of Removal. United States Citizenship and Immigration Services (“USCIS”) scheduled an interview for November 19, 2024. USCIS will work diligently towards completing adjudication of the I-589 application, absent the need for further adjudicative action or unforeseen circumstances that would require additional time for adjudication.

2. Plaintiff agrees to submit all supplemental documents and evidence to USCIS seven to

1 ten days prior to the agreed upon scheduled interview. Plaintiff agrees that failure to timely submit this
2 evidence may result in the rescheduling of the interview at no fault of USCIS.

3 3. If needed by Plaintiff or their dependent(s), Plaintiff shall bring their own interpreter to
4 their asylum interview. See [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)
5 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to their
6 interview may result in the interview being rescheduled at no fault of USCIS.

7 4. Upon receipt of USCIS' decision, Plaintiff agrees to voluntarily dismiss the case.

8 5. The parties agree to bear their own litigation costs and attorney fees.

9 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until
10 March 19, 2025, at which time the parties will file a joint status report with the Court. At that time, the
11 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if
12 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this
13 case will benefit the parties and conserve the Court's resources while the parties pursue a potential
14 administrative resolution.

15 Dated: September 10, 2024

Respectfully submitted,¹

16 ISMAIL J. RAMSEY
17 United States Attorney

18 /s/ Elizabeth D. Kurlan
19 ELIZABETH D. KURLAN
20 Assistant United States Attorney
21 Attorneys for Defendants
22
23
24
25
26

27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.


1 Dated: September 10, 2024

2 /s/ Arash Yasrebi
3 ARASH YASREBI
4 Yasrebi Law
5 Attorney for Plaintiff

6
7 ~~PROPOSED~~ ORDER

8 Pursuant to stipulation, IT IS SO ORDERED.

9
10 Date: September 11, 2024

11 
12 LISA J. CISNEROS
13 United States Magistrate Judge